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KEVIN S. ALBERT AND KIMBERLY
LEBLANC ALBERT, TRUSTEES OF
THE ALBERT REVOCABLE TRUST
UAD 6/3/1997 AND RESTATED 1/7/2020

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

KEVIN S. ALBERT AND KIMBERLY
LEBLANC ALBERT, TRUSTEES OF
THE ALBERT REVOCABLE TRUST
UAD 6/3/1997 AND RESTATED
1/7/2020,

Plaintiffs,

vs.

EDWARD WILLIAM, SL, a foreign
corporation; ION INSURANCE
GROUP S.A., a foreign corporation;
ION INSURANCE COMPANY, INC.,
a foreign corporation; ALLIED
FINANCIAL NETWORK, a Hawaii
corporation; STEVE BONNER;

CIVIL NO. 23-00221 SOM-WRP

**PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT,
AS TO COUNT X, AGAINST
DEFENDANT ION INSURANCE
GROUP S.A.; MEMORANDUM IN
SUPPORT OF MOTION;
CERTIFICATE OF SERVICE**

Trial

Trial Date: June 10, 2025

Judge: The Hon. Derrick K. Watson

LUXURY FINANCIAL GROUP, LLC;
NOELLE NORVELL; JOHN DOES 1-
50; JANE DOES 1-50; DOE
PARTNERSHIPS 1-50; DOE
CORPORATIONS 1-50; DOE
GOVERNMENTAL AGENCIES 1-50;
and DOE ENTITIES 1-50,

Defendants.

**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT, AS TO
COUNT X, AGAINST DEFENDANT ION INSURANCE GROUP S.A.**

Plaintiffs KEVIN S. ALBERT AND KIMBERLY LEBLANC ALBERT,
TRUSTEES OF THE ALBERT REVOCABLE TRUST UAD 6/3/1997 AND
RESTATED 1/7/2020 (collectively, “**Plaintiffs**” or the “**Trust**”), by and through
their undersigned counsel at McCorriston Miller Mukai MacKinnon LLP, hereby
move this Honorable Court for an *Order* GRANTING judgment, as a matter of law,
as to Count X (Insurance Bad Faith) – as set forth in the May 8, 2024 *Second
Amended Complaint* [Doc 84] – against Defendant ION INSURANCE GROUP
S.A. (hereafter, “**Ion SA**”).

This *Motion* is made pursuant to Federal Rules of Civil Procedure (FRCP) 7
and 56; the Local Rules of Practice for the US District Court for the District of
Hawaii (LR) 7.1 and 56.1; the attached *Memorandum In Support of Motion*; the
Separate and Concise Statement of Material Facts, Declarations, and Exhibits
filed concurrently herewith; and the record and file herein.

The undersigned hereby certifies that this *Motion* was made following the conference of counsel, pursuant to LR 7.8, which took place on Monday, February 3, 2025.

DATED: Honolulu, Hawai‘i, February 10, 2025.

/s/ Randall K. Schmitt

RANDALL K. SCHMITT

BRETT R. TOBIN

D. KAENA HOROWITZ

Attorneys for Plaintiffs